UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CONTRARIAN CAPITAL MANAGEMENT,
L.L.C., CONTRARIAN CAPITAL FUND I,
L.P., CONTRARIAN DOME DU GOUTER
MASTER FUND, LP, CONTRARIAN
CAPITAL SENIOR SECURED, L.P.,
CONTRARIAN EM II, LP, CONTRARIAN
EMERGING MARKETS, L.P., POLONIUS
HOLDINGS, LLC, and CONTRARIAN
FUNDS, L.L.C.,

                    Plaintiffs,

      v.

BOLIVARIAN REPUBLIC OF VENEZUELA,

                    Defendant.

Case No. 19 Civ. 11018 [rel. Nos. 19
Civ. 3123 & 18 Civ. 11940]

Hon. Analisa Torres

PLAINTIFFS' NOTICE OF MOTION FOR FEES AND EXPENSES

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, dated October 30, 2020, the accompanying Declaration of Steven F. Molo and the exhibits thereto, and all prior proceedings and papers in this action, Plaintiffs Contrarian Capital Management, L.L.C., Contrarian Capital Fund I, L.P., Contrarian Dome du Gouter Master Fund, LP, Contrarian Capital Senior Secured, L.P., Contrarian EM II, LP, Contrarian Emerging Markets, L.P., Polonius Holdings, LLC, and Contrarian Funds, L.L.C., by and through their undersigned counsel, hereby move the Honorable Analisa Torres, United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York, for an order granting Plaintiffs' Motion for Fees and Costs, and for such further relief as the Court deems just, necessary, and proper.

PLEASE TAKE FURTHER NOTICE that, in accordance with the court's October 1, 2020 opinion granting Plaintiffs' motion for summary judgment, Dkt. 74, Defendant's opposition is due November 30, 2020.

Dated: October 30, 2020   Respectfully submitted,
         New York, New York

                                                    /s/ Steven F. Molo
                                                    Steven F. Molo
                                                    Justin M. Ellis
                                                    Lauren F. Dayton
                                                    MOLOLAMKEN LLP
                                                    430 Park Avenue, 6th Floor
                                                    New York, NY 10022
                                                    Tel.: (212) 607-8170
                                                    Fax: (212) 607-8161
                                                    smolo@mololamken.com

                                                    Elizabeth K. Clarke (admitted *pro hac vice*)
                                                    MOLOLAMKEN LLP
                                                    300 N. LaSalle Street, Suite 5350
                                                    Chicago, IL 60654
                                                    Tel.: (312) 450-6700
                                                    Fax: (312) 450-6701

                                                    Counsel for Plaintiffs